

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

LATRINDA WILLIAMS)
)
)
Plaintiff)
) Civil Action No. 1:15-cv-01555-ELR
vs.)
)
CITY OF ROSWELL,)
WILLIAM GILES, individually, and)
PAUL REID, individually,)
)
Defendants)

**CONSENT MOTION TO STAY THE BRIEFING
SCHEDULE AND REFER THE CASE TO MEDIATION**

COME NOW plaintiff and defendants and jointly move the Court for an order staying the deadline to file motions for deadline and referring the case to mediation, showing the court as follows:

At the request of the parties, the Court extended the deadline for filing of dispositive motions in this matter through May 13, 2016. Counsel have engaged in negotiations and now believe that, although settlement is possible, it will likely require the assistance of a mediator.

The parties therefore respectfully ask the Court for an order staying their respective briefing deadlines for dispositive motions; referring the case to mediation before a magistrate, pursuant to Local Rule 16.7; ordering the parties to

report to this Court with 7 days after mediation as to whether they have reached a compromise agreement; and ordering that any dispositive motions shall be filed within thirty days after mediation takes place, if the case has not been settled.

The undersigned have also discussed the attendance of defendants' insurer at mediation, and respectfully request that the adjuster be permitted to attend mediation by telephone rather than in person.

WHEREFORE, plaintiff and defendants respectfully request the Court to grant this consent motion and enter the proposed consent order, enclosed for the Court's convenience.

Respectfully submitted this 10th day of May, 2016.

FILIPOVITS LAW FIRM, PC <u>s/ Jeffery Filipovits</u> [signed w/ express permission by E. Andrew Treese] Jeffrey Filipovits Georgia Bar no. 825553 2900 Chamblee-Tucker Road Building 1 Atlanta, GA 30341 Phone: (770) 455-1350 jrfilipovits@gmail.com Attorney for Plaintiff	FREEMAN MATHIS & GARY, LLP <u>s/ E. Andrew Treese</u> Sun S. Choy Georgia Bar No. 025148 schoy@fmglaw.com E. Andrew Treese Georgia Bar no. 556850 100 Galleria Parkway Suite 1600 Atlanta, Georgia 30339-5948 (770) 818-0000 Attorneys for Defendants
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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing
**CONSENT MOTION STAY THE BRIEFING SCHEDULE AND REFER
THE CASE TO MEDIATION** with the Clerk of Court using the CM/ECF system
which will automatically send e-mail notification of such filing to the following
attorneys of record:

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Respectfully submitted this 10th day of May, 2016.

s/ E. Andrew Treese
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Georgia Bar No. 556850

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